

1 ROB BONTA
Attorney General of California
2 JOHN D. ECHEVERRIA
Supervising Deputy Attorney General
3 JERRY T. YEN
Deputy Attorney General
4 State Bar No. 247988
1300 I Street, Suite 125
5 P.O. Box 944255
Sacramento, CA 94244-2550
6 Telephone: (916) 210-7836
Fax: (916) 324-8835
7 E-mail: Jerry.Yen@doj.ca.gov
*Attorneys for Defendant Rob Bonta, in his official
8 capacity as California Attorney General*

9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
11
12

13 **DAVID PHILLIP VALLEJOS,**

14 Plaintiff,

15 v.
16

17 **ROB BONTA, in his official capacity**
as the Attorney General of the State
of California and CHAD BIANCO, in
his official capacity as the Riverside
County Sheriff,

20 Defendants.
21
22

Case No. 5:25-cv-00350

**DECLARATION OF JERRY T.
YEN IN SUPPORT OF
DEFENDANT ROB BONTA'S
SPECIAL APPEARANCE AND
OPPOSITION TO PLAINTIFF'S
MOTION FOR PRELIMINARY
INJUNCTION**

Date: April 2, 2025
Time: 1:30 p.m.
Courtroom: 5C
Judge: Hon. Sherilyn Peace
Garnett

23
24 **DECLARATION OF JERRY T. YEN**

25 I, Jerry T. Yen, declare:

26 1. I am a Deputy Attorney General for the Office of the Attorney General
27 for the State of California, attorney of record for Defendant Rob Bonta, in his
28 official capacity as California Attorney General, in this action.

1 2. I am competent to testify to the matters set forth in this declaration, and if
2 called to do so, I would and could so testify. I make this declaration in support of
3 Defendant Rob Bonta's Special Appearance and Opposition to Plaintiff's Motion
4 for Preliminary Injunction.

5 3. A true and correct copy of Professor Robert Spitzer's Declaration filed in
6 *California Rifle & Pistol Ass'n v. Los Angeles County Sheriff's Department*, Case
7 No. 2:23-cv-10169, ECF No. 25-1 (C.D. Cal. Feb. 21, 2024), is attached as **Exhibit**
8 **1**.

9 4. A true and correct copy of Professor Michael Vorenberg's Declaration
10 filed in *California Rifle & Pistol Ass'n v. Los Angeles County Sheriff's Department*,
11 Case No. 2:23-cv-10169, ECF No. 25-2 (C.D. Cal. Feb. 21, 2024), is attached as
12 **Exhibit 2**.

13
14 Dated: March 12, 2025

Respectfully submitted,

15 ROB BONTA
16 Attorney General of California
17 JOHN D. ECHEVERRIA
Supervising Deputy Attorney General

18
19 /s/ Jerry Yen

20 JERRY T. YEN
21 Deputy Attorney General
22 *Attorneys for Defendant Rob Bonta, in*
23 *his official capacity as California*
24 *Attorney General*
25
26
27
28